

UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

VANTIVA USA, LLC,

Plaintiff,

v.

MALIKIE INNOVATIONS, LTD.
AND KEY PATENT INNOVATIONS,
LTD.,

Defendants.

Case No. 1:25-cv-03600-WMR

**DECLARATION OF ANGELA QUINLAN IN SUPPORT OF DEFENDANTS’
MOTION TO DISMISS, TRANSFER OR STAY**

I, Angela Quinlan, declare as follows:

1. I make this declaration based upon my personal knowledge and my investigation of the facts below. If called as a witness, I could and would testify competently to the matters set forth herein. I submit this declaration in support of Defendants’ Motion to Dismiss for Lack of Personal Jurisdiction and Under the First-to-File Rule in the above-captioned action.

2. I have been the Managing Director of Malikie Innovations Ltd. (“Malikie”) since 7 March 2023. I am also Managing Director of Key Patent Innovations, Ltd. (“KPI”), which is Malikie’s parent entity. I reside in Wicklow, Ireland.

3. Malikie is an Irish entity duly organized and existing under the laws of the Republic of Ireland. Malikie's principal place of business is at The Glasshouses GH2, 92 Georges Street Lower, Dun Laoghaire, Dublin A96 VR66, Ireland. Malikie is the successor-in-interest to a substantial portfolio of patents that it acquired in May 2023 from Blackberry Ltd., formerly known as Research in Motion Ltd., and its predecessor, subsidiary, and affiliated companies (collectively, "Blackberry").

4. KPI is an Irish entity duly organized and existing under the laws of the Republic of Ireland. KPI's principal place of business is at The Glasshouses GH2, 92 Georges Street Lower, Dun Laoghaire, Dublin A96 VR66, Ireland. KPI has 14 employees, thirteen of whom live and work in Ireland, with one living and working in Germany.

5. Malikie is a wholly-owned subsidiary of KPI, and KPI is the beneficiary of a trust pursuant to which Malikie owns, holds, and asserts the patents acquired from Blackberry, including the patents in the above captioned action. KPI does not itself own title to any patents.

6. Neither Malikie nor KPI has employees in the United States.

7. Malikie and KPI are not registered to conduct business in Georgia; do not have a registered agent for service of process in Georgia; do not have offices, employees, board members, contractors, equipment, bank accounts, or other assets

in Georgia; are not subject to and have never paid taxes in Georgia; do not manufacture or sell any products in Georgia; have never granted a license to any Malikie patent to a company with a principal place of business in Georgia; have not conducted live, in-person meetings in Georgia concerning any of Malikie's patents; and do not own, lease, or rent any property in Georgia.

8. Neither Malikie nor KPI has ever filed a lawsuit in Georgia.

9. Their only pending lawsuits concerning Malikie's patents in the United States that Malikie and/or KPI have filed are patent infringement litigations filed in federal courts in Texas and Washington: (1) *Malikie Innovations Ltd. v. Acer Inc.* (Eastern District of Texas) (Case No. 2:24-cv-00179-JRG-RSP); (2) *Malikie Innovations Ltd. v. ASUSTeK Computer Inc.* (Eastern District of Texas) (Case No. 2:24-cv-00178-JRG-RSP); (3) *Malikie Innovations Ltd. v. D-Link Corporation* (Eastern District of Texas) (Case No. 2:24-cv-00244-JRG-RSP); (4) *Malikie Innovations Ltd. et al v. Nintendo Co, Ltd., et al* (Western District of Washington) (Case No. 2:24-cv-01490-JLR); (5) *Malikie Innovations Ltd. et al. v. Sophos Ltd.* (Eastern District of Texas) (Case No. 2:24-cv-00905-JRG-RSP); (6) *Malikie Innovations Ltd. et al. v. Vantiva SA f/k/a/ Technicolor SA* (Eastern District of Texas) (Case No. 2:25-cv-163); (7) *Malikie Innovations Ltd. et al. v. Match Group* (Northern District of Texas) (Case No. 3:25-cv-00381-K); (8) *Malikie Innovations Ltd. et al. v. Bumble Inc., et al.* (Western District of Texas) (Case No. 1:25-cv-00258-ADA); (9)

Malikie Innovations Ltd. et al. v. MARA Holdings Inc. (Western District of Texas) (Case No. 7:25-cv-000222-DC-DGT); (10) *Malikie Innovations Ltd. et al. v. Toast Inc.* (Western District of Texas) (Case No. 1:25-cv-00716-ADA); (11) *Malikie Innovations Ltd. et al. v. Core Scientific Inc.* (Eastern District of Texas) (Case No. 2:25-cv-519); (12) *Malikie Innovations Ltd. et al. v. Vivint Smart Home, Inc. et al.* (Eastern District of Texas) (Case No. 2:25-cv-555); (13) *Malikie Innovations Ltd. et al. v. ADT Inc. et al.* (Eastern District of Texas) (Case No. 2:25-cv-554); (14) *Malikie Innovations Ltd. et al. v. SAP America Inc. et al.* (Eastern District of Texas) (Case No. 2:25-cv-946); (15) *Key Patent Innovations, Ltd. et al. v. BlackBerry Corp.* (Eastern District of Texas) (Case No. 2:25-mc-00006).

10. The overwhelming majority of Malikie's patents (over 32,000) were acquired from Blackberry in 2023, including the patents asserted in the above-captioned action. The only other patents owned by Malikie is a group of approximately 65 patents that were acquired from Asustek in March 2025.

11. I understand from Blackberry's website that it is based in Waterloo, Ontario, Canada and has offices around the world. Its only locations in the United States are in Plano, Texas and Novi, Michigan.¹

12. On February 20, 2024, I sent a letter addressed to Olga Damiron,

¹ <https://www.blackberry.com/us/en/company/blackberry-office-locations>. Last visited 14 October 2025.

Corporate General Counsel of Vantiva SA, with respect to the infringement of the four patents in the above captioned action. Ex. C. On March 15, 2024, June 10, 2024, September 5, 2024, and June 30, 2025 I sent follow up letters to Ms. Damiron (and copying the general counsel of Vantiva SA on the final correspondence). Exs. D, E, F, G. No one from Vantiva SA ever responded to any of my correspondences or communicated with Malikie or KPI for any reason.

13. On February 10, 2025, Malikie and KPI filed a lawsuit against Vantiva SA in the Eastern District of Texas. No one from Vantiva USA or any subsidiary of Vantiva SA contacted Malikie or KPI prior to the filing of that lawsuit.

14. Malikie and KPI have not conducted any business with Vantiva SA, Vantiva USA or any other Vantiva SA subsidiary in Georgia and have not participated in any meetings in Georgia with any Vantiva SA or Vantiva USA customers.

15. Malikie and KPI acknowledge, agree, and consent, based at least on the above facts, that personal jurisdiction over them in this matter would be proper in Texas.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 29, 2025

/Angela Quinlan/

Angela Quinlan